



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

January 19, 2021

VIA ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Lin v. Wolf, et al.*, No. 20 Civ. 10117 (RA)

Dear Judge Abrams:

This Office represents the government in this action in which plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate her Application to Register Permanent Residence or Adjust Status (Form I-485). On behalf of both sides, I write respectfully to request that the Court adjourn the initial conference presently scheduled for January 22, 2021 by approximately one month. I apologize to the Court for making this request after the date that the parties’ joint letter and proposed case management plan were due (*i.e.*, on January 15, 2021).

The parties jointly request the adjournment because the government’s response to the complaint is not due until February 11, 2021. This Office is still gathering information, including from the USCIS Texas Service Center, regarding the status of the I-485 application and adjudication. Based on this information, the parties will discuss next steps in this case, including whether to request an extension of the government’s time to respond to the complaint commensurate with certain steps being taken towards adjudication, as is typical in similar cases. The parties thus respectfully submit that the requested adjournment is in the interests of efficiency and conservation of resources. This is the first request to adjourn the initial conference.

Again, I apologize for making this request after the parties’ joint submissions were due. In light of the delay, the parties will endeavor to file their joint submissions by the end of the day, in the event that the Court determines to proceed with the initial conference on January 22.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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United States Attorney

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SO ORDERED.

Hon. Ronnie Abrams
January 19, 2021